

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. ) Crim. No. 20-cr-40021-TSH  
RAHIM SHAFA, et al. )  
Defendants )

**JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(b)**

The United States of America and defendants Rahim Shafa and Nahid Tormosi Shafa hereby submit this joint memorandum addressing Local Rule 116.5(c) in advance of the interim status conference scheduled for June 4, 2021. The parties request that the Court cancel the final status conference as there are no outstanding issues at this time needing the Court's attention. The parties further request that this matter be referred to the District Judge for a pretrial conference and trial date.

## **I. Local Rule 116.5(c)(2)(A)**

The Government has produced all discovery that it is aware of consistent with the local rules and the Federal Criminal Rules of Criminal Procedure. The Government and defendants have been in ongoing discussions regarding a superseding indictment in this case. The Government expects that any superseding indictment will be brought within 30 days of the filing of this report. Any discovery to be produced related to the new charges will not be too large and the parties expect that they can review any such discovery before the trial in this matter, which, given the Court's calendar will not be likely until 2022.

**II. Local Rule 116.5(c)(2)(B)**

There are no outstanding discovery requests or motions.

**III. Local Rule 116.5(c)(2)(C)**

The defendants may file motions under Fed. R. Crim. P. 12(b). Any such motions will be filed within approximately 60 days of the filing of the report.

**IV. Local Rule 116.5(c)(2)(D)**

The parties request the Court exclude time between June 4, 2021 and the date of the pretrial conference before the District Judge. This time should be excluded because the defendants expect to use such time to review additional discovery that may be produced related to additional charges that may be brought.

**V. Local Rule 116.5(c)(2)(E)**

Should this case proceed to trial, the parties expect the trial to last between two and three weeks.

Respectfully submitted,

RAHIM SHAFA  
By his counsel,

/s/ R. Bradford Bailey  
R. Bradford Bailey  
44 School Street  
Suite 100B  
Boston, Massachusetts 02108

NAHID TORMOSI SHAFA  
By her counsel,

/s/ Robert L. Sheketoff  
Robert L. Sheketoff  
One McKinley Square  
Boston, MA 02109

NATHANIEL R. MENDELL  
ACTING UNITED STATES ATTORNEY

/s/ John T. Mulcahy  
John T. Mulcahy  
Assistant United States Attorney  
595 Main Street  
Worcester, Massachusetts 01608

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ John T. Mulcahy

John T. Mulcahy  
Assistant U.S. Attorney

Dated: June 3, 2021